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10 Attorneys for Plaintiffs BRUCE CAHILL, GREG CULLEN,
11 SHANE SCOTT, RON FRANCO, and PHARMA PAK, INC.

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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

BRUCE CAHILL, an individual, et al.,)	CASE NO: 8:16-cv-00686-AG-DFM
)	
Plaintiffs,)	DECLARATION OF BRUCE
)	CAHILL IN SUPPORT OF
-- vs. --)	PLAINTIFFS' MOTION TO
)	RESTRAIN UNLAWFUL
PAUL PEJMAN EDALAT, an)	CONDUCT BY DEFENDANTS
individual, et al.,)	AND TO ADVANCE THE TRIAL
)	DATE IN THIS ACTION
Defendants.)	
)	Date: November 28, 2016
)	Time: 10:00 a.m.
)	Place: Courtroom 10D
)	Honorable Andrew J. Guilford
AND RELATED CROSS-)	United States Courthouse
CLAIMS/COUNTERCLAIMS.)	411 West Fourth Street
)	Santa Ana, CA 92701-4516

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**DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
RESTRAIN UNLAWFUL CONDUCT BY DEFENDANTS AND TO ADVANCE THE TRIAL
DATE IN THIS ACTION**

CASE NO: 8:16-cv-00686-AG-DFM

1 Bruce Cahill, declares under penalty of perjury as follows:

2 1. I am a Plaintiff in the above-captioned action. The facts stated herein are
3 based upon my own personal knowledge or, if based upon information and belief,
4 I believe them to be true. If called upon to do so I could and would testify
5 competently to the statements set forth below.
6

7
8 2. Attached as Exhibit A is a text message sent to me and others by Paul
9 Edalat.
10

11 3. Attached as Exhibit B is an email sent by Paul Edalat to the Plaintiffs in this
12 case.
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14 4. Attached as Exhibit C is a text message sent to me and others by Paul
15 Edalat.
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17 5. Attached as Exhibit D is an email sent by Paul Edalat to the Plaintiffs in this
18 case.
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20 6. Attached as Exhibit E is an email written by Paul Edalat to our trial counsel
21 of record in this case, John Markham.
22

23 7. Attached as Exhibit F is an Instagram post by Olivia Karpinski on
24 September 9, 2016. This went up on the internet and falsely states that I sexually
25 assaulted her, when I did not, and makes other false allegations.
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27 ii

28 **DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
RESTRAIN UNLAWFUL CONDUCT BY DEFENDANTS AND TO ADVANCE THE TRIAL
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CASE NO: 8:16-cv-00686-AG-DFM

1 8. Attached as Exhibit G is an excerpt of a deposition taken of Olivia Karpinski
2 on October 14, 2016 during which she admits that despite having claimed that I
3 “sexually assaulted” her, that I did not do so.
4

5 9. Attached as Exhibit H is another internet post where Ms. Karpinski repeats
6 her false allegation that I sexually assaulted her when I did not do so.
7

8 10. Attached as Exhibit I is another internet post by Olivia Karpinski in which
9 she identifies me by name, identifies that I am a trustee of the University of
10 California at Irvine, and falsely states that I “knowingly and willfully subjected
11 [her] to sexually charged interactions” and states that questions about her post can
12 be sent to “The Durst firm,” just as Mr. Edalat makes the same references in his
13 posts quoted in other exhibits to this Declaration.
14

15 11. Attached as Exhibit J is a Twitter post by Paul Edalat referring to me as the
16 “westcoastberniemadoff” and posting a photo of me next to one of Madoff.
17

18 12. Attached as Exhibit K is a Twitter post by Paul Edalat making references to
19 the mafia, and warning some of the Plaintiffs and their counsel that his respect “is
20 not to be fucked with,” along with other matters.
21

22 13. Attached as Exhibit L is a Twitter post by Paul Edalat which depicts several
23 bank checks written on the account of Plaintiff Pharma Pak with the Pharma Pak
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27 iii

28 **DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
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1 account number fully visible. On the Exhibit shown to this Court, the account
2 number has been redacted although as posted by Mr. Edalat, it remains in plain
3 view. This tweet also refers to “westcoastberniemadoff.”
4

5 14.Attached as Exhibit M is a Twitter post by Paul Edalat accusing me of
6 “trying to slut shame” Olivia Karpinski.
7

8 15.Attached as Exhibit N is a Twitter post of a photograph posted on the
9 internet by Paul Edalat depicting me in a car counting some cash, and again,
10 making reference to “westcoastberniemadoff” and Bruce Cahill.
11

12 16.Attached as Exhibit O is a Facebook post by Paul Edalat of the article posted
13 by Olivia Karpinski in which she falsely accuses me of sexual assault and other
14 crimes and in which Mr. Edalat states publically to Ms. Karpinski in this internet
15 post “Way to stand up for your rights Olivia! Bruce Cahill and his fraud of a gang
16 will face justice soon!”
17

18 17.Attached as Exhibit P is another Facebook post by Paul Edalat in which he
19 publically states the names of all the individual Plaintiffs, calls Plaintiff Shane
20 Scott a “self proclaimed “fake church priest and healer” (tax evader) & lastly Ron
21 Franco. . .” This again refers to “westcoastberniemadoff.”
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27 iv

28 **DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
RESTRAIN UNLAWFUL CONDUCT BY DEFENDANTS AND TO ADVANCE THE TRIAL
DATE IN THIS ACTION**

CASE NO: 8:16-cv-00686-AG-DFM

1 18. Attached as Exhibit Q is another Twitter post by Paul Edalat identifying our
2 counsel in this case by name, making references to Whitey Bulger, stating that
3 “no honest lawyer in CA” would take the Plaintiffs’ case and states that “Boston
4 lawyer John Markham defends tax cheats and fraudsters. Wonder what Shane
5 Scott and Bruce Cahill have to hide.”
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8 19. Attached as Exhibit R is a portion of the credit report of Attorney John
9 Markham posted on Twitter by Paul Edalat and which contains Markham’s social
10 security number. On the annexed Exhibit, the social security number is redacted,
11 but it was not on the internet post made by Mr. Edalat. This post continues by
12 telling Markham “looking forward to discussing your 55 page checkered
13 background.”
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16 20. I never sexually assaulted Olivia Karpinski, nor anyone else. I never
17 engaged in sexual harassment. While it is true, as one of the posts states, that I
18 have had two other cases involving former employees, I prevailed in both of
19 these. One employee was a woman who stole from a company I was operating
20 and she filed sexual harassment claims against me only after I had filed charges
21 against her. She went to jail and the sexual harassment charges were dismissed. A
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27 v

28 **DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
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DATE IN THIS ACTION**

CASE NO: 8:16-cv-00686-AG-DFM

1 judgment against her was also obtained. The other case concerned another
2 employee who we sued and against whom a judgment was obtained.
3

4 I declare under penalty of perjury under the laws of the State of California
5 that the foregoing is true and correct.
6

7 Executed this 19th day of October, 2016, in Irvine, California.
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10 Bruce Cahill

11 Bruce Cahill
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27 vi

28 **DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
RESTRAIN UNLAWFUL CONDUCT BY DEFENDANTS AND TO ADVANCE THE TRIAL
DATE IN THIS ACTION**

CASE NO: 8:16-cv-00686-AG-DFM

1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct.
3

4 Executed this 19th day of October, 2016, in Irvine, California.
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8 Bruce Cahill
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CERTIFICATE OF SERVICE

Commonwealth of Massachusetts) ss,
County of Suffolk.)

I am employed in the county and state aforesaid. I am over the age of 18 and not a party to the within action. My business address is One Commercial Wharf West, Boston MA 02110

On October 19, 2016, I served the foregoing document described as:

**DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS'
NOTICE OF MOTION AND MOTION TO RESTRAIN UNLAWFUL
CONDUCT BY DEFENDANTS AND TO ADVANCE THE TRIAL DATE
IN THIS ACTION**

[X] BY ELECTRONIC MAIL via the ECF filing system on:

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Attorneys for Defendants Paul Pejman Edalat, Olivia Karpinski, Farah Barghi, Sentar Pharmaceuticals, Inc., Blue Torch Ventures, Inc., LIWA, N.A., Inc., and

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**DECLARATION OF BRUCE CAHILL IN SUPPORT OF PLAINTIFFS' MOTION TO
RESTRAIN UNLAWFUL CONDUCT BY DEFENDANTS AND TO ADVANCE THE TRIAL
DATE IN THIS ACTION**

CASE NO: 8:16-cv-00686-AG-DFM

1 *Sentus Land Management, LLC*

2 Executed on October 19, 2016, in Boston, Massachusetts.

3
4 I declare under penalty of perjury under the laws of United States and the State of
5 California that the foregoing is true and correct.

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7 /s/ John J. E. Markham, II
8 John J. E. Markham, II
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